



December 14, 2006

Office of Passport Policy, Planning and Advisory Services
Bureau of Consular Affairs
U.S. Department of State
2100 Pennsylvania Ave., NW
Suite 300
Washington, DC 20037

Docket Number: DOS-2006-0329-0001
RIN 1400-AC22

Dear Sir or Madam:

The Arizona Office of Tourism (AOT) appreciates the opportunity to comment on the rule to implement the alternative passport document or the People, Access Security Service (PASS) Card that appeared in the *Federal Register* on October 17, 2006.

AOT, on behalf of the State of Arizona and the tourism industry, has been very involved in working to facilitate travel for visitors and maintain the highest standard of security. Arizona Governor Janet Napolitano has consistently supported the U.S. government's need to increase security at ports of entry and has advocated for the technology to do so, while promoting the facilitation of trade and travel to and from the United States.

In a letter dated October 31, 2005, in response to the Advanced Notice of Proposed Rulemaking issued by the Department of Homeland Security (DHS) and the Department of State (DOS), AOT supported the Western Hemisphere Travel Initiative (WHTI) and firmly supported extension of the deadline for WHTI and a less expensive alternative to the passport. The obvious reasons were to allow the government enough time to implement new standards and technology, to properly train employees on the new technology and to work with the tourism industry to inform travelers of the new regulations requiring a passport or a lower cost document to travel across the border, so that trade and tourism would not be negatively impacted.

According to the U.S. Department of Commerce, international visitation through 2010 will be driven by visitors from Latin America, Mexico and Canada. It is crucial that travelers be able to have flexibility when traveling to and from Mexico and Canada.

In 2005, 31 million people visited Arizona and spent nearly \$17.5 billion. Many of those visitors take advantage of our proximity to the border and take day trips or spontaneous trips to Mexico. It is vital for Arizona's economy that new technology and standards

allow visitors to make cross border trips so that Arizona does not lose those visitors to other tourist destinations.

AOT appreciates that DOS and DHS understand the need to facilitate travel and the efforts to ensure that the PASS Card be economical. However, there are several concerns that remain, such as:

- The RFID chips that are proposed for the PASS Card will use proximity technology, which is different than the RFID vicinity technology that is being implemented for US-VISIT, and this may cause unnecessary delays at the border. AOT supports the implementation of one standard of technology used at all ports of entry. The standard must be fully operational prior to the implementation of WHTI.
- AOT supports more training and personnel at the border to facilitate safety and ease of travel for visitors. Once the technology is in place and operational, it is imperative that staff be fully trained on the technologies for WHTI and the PASS Card to allow for the proper security of the border and the ease of travel for our visitors.
- AOT believes it is necessary for NEXUS cards, SENTRI cards, Border Crossing Cards and FAST driver identification cards to remain permissible alternatives to a passport.
- AOT strongly favors a provision that will allow casual visitors to Arizona to take spontaneous trips across the border. Arizona's unique proximity to the border with Mexico is a significant reason that visitors choose Arizona as their destination and losing this segment of travelers would be harmful to the economy.

The extension of the deadline for implementation of WHTI was advocated by AOT and we applaud the 109th Congress for agreeing on the extension. There is still much work ahead as we coordinate with DHS and DOS to launch a broad and extensive outreach campaign to inform travelers of the new requirements and deadlines for implementation.

AOT will continue to work with DHS and DOS, through the Arizona-Mexico Commission, the Border Trade Alliance and other tourism organizations, to represent the need for secure borders and ease of travel for visitors.

Sincerely,



Margie A. Emmermann
Director
Arizona Office of Tourism